

with 10 of the 11 recognized tribes with reservations in Wisconsin, was also involved in reviewing the Hudson application.

Denise Homer became the acting MAO Area Director in or about November 1993, and was made the permanent Director in the spring of 1994. Although Homer had previously served in several different capacities in the BIA, in the field and in Washington, she had no prior direct experience with gaming issues.⁶⁷

Prior to July 1990, Area Offices had the authority to determine whether to grant or refuse applications to take land into trust – whether for on- or off-reservation land and whether for gaming or for some other purpose – although the Secretary of the Interior or his designee actually signed the documents taking the land into trust.⁶⁸ Gaming applications were then handled by the Area Offices and the BIA Office of Trust Responsibilities, with significant input from the Solicitor’s Office.⁶⁹

In July 1990, then-Secretary Manuel Lujan centralized the decision-making process for off-reservation gaming trust acquisition applications by reserving to the “central office” in

⁶⁷Homer retired from the BIA in December 1995. She stated that neither her decision to retire nor the timing of that decision related to the Hudson application.

⁶⁸According to a May 2, 1995, briefing memo to the Secretary of the Interior issued by the IGMS staff about the legal and administrative process governing off-reservation gaming, in the period of January 1994 to February 1995, there were 360.98 acres taken into trust for four tribes in Minnesota for purposes other than gambling.

⁶⁹The Office of the Solicitor is the legal counsel’s office for DOI. Headed by a Solicitor, it includes a division of Indian Affairs – headed by an Associate Solicitor for Indian Affairs – that provides legal advice on most issues relating to tribes or tribal members. The Solicitor’s Office also includes regional offices, known as Field Solicitors, that provide assistance to Area Offices and agencies. The Minneapolis Area Office and the Great Lakes Agency relied upon the Twin Cities Field Solicitor’s Office for legal advice on their activities.